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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN DOE, JOHN DOE, SR. and  
JANE DOE,  
Plaintiffs

vs.

FATHER ERIC ENSEY, FATHER CARLOS  
URRUTIGOITY, DIOCESE OF SCRANTON,  
BISHOP JAMES C. TIMLIN, THE  
SOCIETY OF ST. JOHN, THE PRIESTLY  
FRATERNITY OF ST. PETER, and  
ST. GREGORY'S ACADEMY,  
Defendants

DOCKET NO. 3:CV-02-0444

FILED  
SCRANTON  
(JUDGE CAPUTO)

JUN 11 2002

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PER 4  
DEPUTY CLERK

MOTION FOR ENLARGEMENT OF TIME

AND NOW come the Defendants, Father Eric Ensey, Father Carlos Urrutigoity and Society of St. John, by and through their attorneys, FOLEY, COGNETTI, COMERFORD & CIMINI, and hereby aver the following in support of their Motion For Enlargement Of Time in which to respond to Plaintiffs' Complaint.

1. On or about March 20, 2002 Plaintiffs filed the above captioned action.
2. On or about May 24, 2002 Defendants, Father Eric Ensey, Father Carlos Urrutigoity and Society of St. John were served with the Complaint.
3. The undersigned is requesting that its Reply to Plaintiffs' Complaint be filed on before August 15, 2002.
4. The undersigned has contacted counsel for Plaintiffs,

Douglas A. Clark, Esquire, regarding this request and Mr. Clark has provided his concurrence to said request.

5. The undersigned avers that their request for an enlargement of time is necessary in order to prepare an adequate reply to Plaintiffs' Complaint in the instant matter.

6. The moving parties are also Defendants in two related actions filed by Plaintiffs' counsel on behalf of other parties which are currently pending in the Court of Common Pleas of Pike County. Plaintiffs' counsel and the undersigned have reached an agreement in those matters which allows Defendants to also provide their responses to those Complaints on or before August 15, 2002.

WHEREFORE, the undersigned respectfully requests that this Honorable Court enter an Order allowing Defendants Father Eric Ensey, Father Carlos Urrutigoity and Society of St. John until August 15, 2002 in which to respond to Plaintiffs' Complaint.

Respectfully submitted,

FOLEY, COGNETTI, COMERFORD  
& CIMINI


BY: Vincent S. Cimini  
VINCENT S. CIMINI, ESQ.  
ATTORNEY FOR DEFENDANTS  
FATHER ERIC ENSEY, FATHER CARLOS  
URRUTIGOITY AND SOCIETY OF ST.  
JOHN

507 Linden Street  
Suite 700  
Scranton, PA 18503  
(570) 346-0745

**CERTIFICATE OF CONCURRENCE**

I hereby state that I have contacted counsel for Plaintiffs, Douglas A. Clark, Esquire, regarding the within request for an enlargement of time until August 15, 2002 in which to respond to Plaintiffs' Complaint and Mr. Clark has provided his concurrence.

FOLEY, COGNETTI, COMERFORD  
& CIMINI

BY:   
VINCENT S. CIMINI, ESQ.  
ATTORNEY FOR DEFENDANTS  
FATHER ERIC ENSEY, FATHER CARLOS  
URRUTIGOITY AND SOCIETY OF ST.  
JOHN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION FOR ENLARGEMENT OF TIME was served upon counsel of record and unrepresented parties herein by first class, United States mail, postage prepaid, on the 11th day of June, 2002 in the instant action addressed as follows:

Douglas A. Clark, Esq.  
The Ritz Building  
222 Wyoming Avenue  
Scranton, PA 18503  
(Counsel for Plaintiffs)

Diocese of Scranton  
300 Wyoming Avenue  
Scranton, PA 18503

Most Reverent James C. Timlin  
Diocese of Scranton  
300 Wyoming Avenue  
Scranton, PA 18503

Joseph F. Leeson, Jr., Esq.  
LEESON & LEESON  
70 East Broad Street  
P. O. Box 1426  
Bethlehem, PA 18016  
(Counsel for Priestly Fraternity of Saint Peter  
and Saint Gregory's Academy)

FOLEY, COGNETTI, COMERFORD  
& CIMINI

BY: Vincent S. Cimini  
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